

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

UNITED STATES OF AMERICA

v.

ERICA RENEE WATKINS

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1:22CR315-1



The Grand Jury charges:

COUNT ONE

1. At all times material herein, the United States Department of Veterans Affairs (hereinafter "the VA") was an agency of the Executive Branch of the government of the United States.

2. At all times material hereto, the VA operated the nation's largest integrated health care benefit program, including both health care facilities and programs providing health care benefits to or for the benefit of disabled veterans.

3. At all times material herein, the VA operated a VA Medical Center in Durham, North Carolina for the provision of medical treatment to qualified veterans. (the "Medical Center").

4. At all times material herein, the VA operated a computerized record system known as Computerized Patient Record System ("CPRS"). CPRS is used and accessible throughout the nationwide VA Medical System.

5. Access to CPRS is restricted to authorized VA medical personnel and is used to maintain patient records, medical history and current treatment orders and protocols. Access to CPRS is password protected and allowed for the purpose of accessing, recording and dispersing patient medical records, treatment orders and protocols.

6. The accuracy and integrity of the patient information recorded and contained in CPRS is essential to the operations of the VA medical system including the Medical Center and to the effective care and treatment of specific VA patients.

7. At all times material herein, ERICA RENEE WATKINS was employed at the Medical Center as a registered nurse. On August 31 and September 1, 2021, ERICA RENEE WATKINS was assigned as a nurse tending to patients on Ward 6B of the VA Medical Center with responsibility for patients on the ward during the Evening 2 and Night Shifts, such as shifts running from 7:30 PM on the night of August 31, 2021, to 8:30 AM on September 1, 2021.

8. At all times material herein, ERICA RENEE WATKINS was authorized to access CPRS for the purpose of patient care and to record medical information as to the patients under her care.

9. A veteran whose initials are W.F. was a patient of the Medical Center on August 31, 2021 and was transferred to Ward 6B at approximately 11:30 am on that date.

10. Pursuant to Medical Center protocol ERICA RENEE WATKINS was responsible for recording in CPRS all nursing care provided to W.F. during her shift.

11. At approximately 1:48 PM on August 31, 2021, the physician attending W.F. entered an order directing that W.F.'s vital signs including temperature, pulse, respirations and blood pressure be taken every four hours. At approximately 1:53 PM the attending physician further ordered that a physician should be notified if W.F.'s vital signs were outside of a range specified by the attending physician.

12. At approximately 11:30 PM on August 31, 2021, ERICA RENEE WATKINS and other nurses cleaned and provided care to W.F. Thereafter, ERICA RENEE WATKINS did not enter W.F.'s room to check his vitals or provide other care until approximately 7:00 am despite being aware that the attending physician had ordered that W.F.'s vital signs be checked every four hours.

13. At approximately 12:37 AM on September 1, 2021, W.F. died as a result of a cardiac event.

14. At approximately 7:00 AM on September 1, 2021, ERICA RENEE WATKINS discovered that W.F. was non-responsive and notified Medical Center Personnel, who attempted unsuccessfully to resuscitate W.F., who had in fact been dead for over six hours and was in a state of rigor mortis.

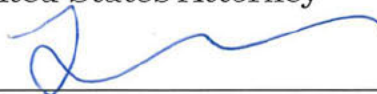
15. At approximately, 7:20 AM on September 1, 2021, ERICA RENEE WATKINS accessed CPRS and made false entries of vitals and patient pain responses for W.F. purporting to show that ERICA RENEE WATKINS had checked W.F.'s pain response at 2:00 AM and taken his vitals at 3:00 AM, when, as ERICA RENEE WATKINS then well knew, she had not done so and the pain response and vitals entered into CPRS had been fabricated by her and entered in CPRS.

16. On or about September 1, 2021, in the County of Durham, in the Middle District of North Carolina, ERICA RENEE WATKINS did willfully and knowingly make and use a false writing and document knowing the same to contain a false, fictitious and fraudulent statement and entry within the jurisdiction of the VA, an agency of the executive branch of the government of the United States, by entering false vitals and patient pain responses for W.F. purportedly taken at 3:00 AM on September 1, 2021, into CPRS when, as ERICA RENEE WATKINS then well knew, she had fabricated such vitals and

pain responses and had not taken such vitals or patient pain responses at 3:00 AM on September 1, 2021; in violation of Title 18 United States Code Section 1001(a)(3).

DATED: September 26, 2022

SANDRA J. HAIRSTON  
United States Attorney



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BY: FRANK J. CHUT, JR.  
Assistant United States Attorney

A TRUE BILL:



FOREPERSON

